

Colleen Larkin Bell (5253)  
Jenniffer Nelson (7947)  
Questar Gas Company  
180 East First South  
P.O. Box 45360  
Salt Lake City, Utah 84145  
(801) 324-5556  
(801) 324-5935 (fax)  
colleen.bell@questar.com  
jenniffer.nelson@questar.com

*Attorneys for Questar Gas Company*

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF UTAH**

APPLICATION FOR APPROVAL OF FOURTH )  
YEAR BUDGET FOR 2010 DEMAND SIDE ) Docket No. 09-057-15  
MANAGEMENT PROGRAMS AND )  
MARKET TRANSFORMATION INITIATIVE )

**I. INTRODUCTION**

1. In its Order issued in Docket No. 05-057-T01 (Order), the Utah Public Service Commission (the Commission) approved Questar Gas Company's Application for Expedited Approval of Demand-Side Management Programs and a Market Transformation Initiative (Original Application), and approved a three-year pilot program for Questar Gas Company's (Questar Gas or Company) Demand Side Management (DSM) programs in conjunction with the Conservation Enabling Tariff (CET). On June 24, 2009, the Commission extended the CET/DSM Pilot Program until December 31, 2010. (Order Extending Conservation Enabling Tariff/Demand Side Management Pilot Program to December 2010, Docket No. 05-057-T01.) Accordingly, Questar Gas now respectfully submits this Application for Approval of its Fourth

Year Budget for its 2010 DSM and Market Transformation Initiative, to seek approval of costs associated with the continuance of the DSM component of the CET/DSM Pilot Program.

## **II. OVERVIEW OF PROPOSED 2010 DSM PROGRAMS AND MARKET TRANSFORMATION INITIATIVE**

2. In the Original Application, the Company listed seven best practices for developing successful (DSM) programs. These seven best practices are:

1. Develop a comprehensive energy-efficiency approach;
2. Simplify and integrate program offerings;
3. Brand DSM and focus on customer service;
4. Develop strategic partnerships with market participants;
5. Provide customized service, when applicable;
6. Provide qualified, independent expertise; and
7. Integrate program evaluation early.

Through the design, development, implementation and administration of DSM programs, the Company has successfully achieved, and in many cases exceeded, each of the best practices outlined in the Original Application. The Company's ThermWise energy-efficiency campaign is a model for natural gas utility programs nationwide. The ThermWise rebate programs are customer friendly and cost effective.

3. In addition to the implementation and development of the ThermWise energy-efficiency campaign, the Company has made a concerted effort to maintain high levels of customer service. The Company has developed relationships with trade allies, including wholesalers, heating, ventilation and air conditioning (HVAC), and weatherization contractors, dealers and retailers. The Company has built flexibility into the implementation and marketing of its programs to allow for customized service when required. The Company continues to utilize the independent and experienced knowledge base of its program administrators, Nexant, Inc. (Nexant) and Portland Energy Conservation, Inc. (PECI). Pursuant to the Order, the

Company has worked closely with the Division of Public Utilities (Division) and DSM Advisory Group to develop a timely and meaningful DSM evaluation plan which is currently being implemented by its consultant, the Cadmus Group.

4. Based on input from the DSM Advisory Group, Utah-based trade allies, program administrators and other energy-efficiency stakeholders, Questar Gas proposes continuing the eight existing DSM programs with some modifications.

5. The existing DSM programs are: 1) the ThermWise Appliance Rebates Program; 2) the ThermWise Builder Rebates Program; 3) the ThermWise Business Rebates Program; 4) the ThermWise Weatherization Rebates Program; 5) the ThermWise HomeEnergy Audit Program; 6) funding of \$500,000 for the Low-Income Weatherization Assistance Program administered by the Utah Department of Community and Economic Development, 7) the ThermWise Multifamily Rebates Program; and 8) the ThermWise Business Custom Rebates Program.

6. **ThermWise Appliance Rebates.** This program offers rebates to customers for installing qualifying program measures. The Company is proposing to continue this program with one improvement. The Company recommends the implementation of a tiered rebate structure for natural gas storage water heaters by adding a .67 Energy Factor (EF) water heater measure to the existing rebate program, in order to align with the changes in the ENERGY STAR labeling requirements that are expected to be implemented on September 1, 2010. Questar Gas will continue to offer this program to customers in the Company's Utah service territory and PECI will continue to administer the program. QGC DSM Exhibit 4.1 sets forth the complete program description for 2010.

7. **ThermWise Builder Rebates.** This program offers rebates to residential builders for installing qualifying energy-efficiency measures. The Company is proposing to

continue this program with one improvement. The Company recommends the implementation of a tiered rebate structure for natural gas storage water heaters with the addition of a .67 Energy Factor (EF) water heater measure to the rebate program in order to align with changes in the ENERGY STAR labeling requirements that are expected to be implemented on September 1, 2010. This program will continue to be administered by PECL. Questar Gas will continue to make this program available to residential builders in its Questar Gas Utah service territory and to include incentives for installing natural gas energy-efficiency measures in newly constructed residences receiving service on a GS rate schedule. QGC DSM Exhibit 4.2 sets forth the complete program description for 2010.

8. **ThermWise Business Rebates.** This program offers rebates to commercial customers who purchase and install qualifying natural gas efficiency measures. The Company is proposing to continue this program with the following improvements: 1) implementing a tiered rebate structure for natural gas storage water heaters with the addition of a .67 Energy Factor (EF) water heater measure to the rebate program to align with changes in the ENERGY STAR labeling requirements that are expected to be implemented on September 1, 2010; and 2) add weatherization measures specifically targeted toward retrofit projects with different eligibility requirements and higher incentives than weatherization measures already included in the program for new construction projects. These improvements more closely align the program with market conditions and will help to ensure that program savings are achieved as desired. The Company will continue to offer this program to GS commercial customers in the Company's Utah and Idaho service territories and Nexant will continue to administer the program. QGC DSM Exhibit 4.3 sets forth the complete program description for 2010.

9. **ThermWise Weatherization Rebates.** This program offers residential customers rebates for installing qualifying weatherization measures. The Company is proposing to continue this program with the following improvements: 1) allow only one rebate to be paid per premise for attic and floor insulation rebate measures; 2) implement a tiered rebate structure for attic insulation rebates by adding a second rebate level of \$.07 per square foot rebate for installed insulation R-30 and above; 3) allow rebates only when the final R-value is at least R-38 but not more than R-60, in order to meet current energy building codes and align with current DOE recommendations. These combined changes are expected to encourage higher levels of installed insulation that will more closely align rebate costs to savings levels achieved. This program will continue to be available to existing residential customers in the Company's Utah service territory and Nexant will continue to administer the program. QGC DSM Exhibit 4.4 sets forth the complete program description for 2010.

10. **ThermWise Home Energy Audit.** The Company is proposing to continue this program. Questar Gas offers and administers the ThermWise Home Energy Audit Program and Nexant and Fundamental Objects provide periodic consulting and assistance, as needed. This program includes two primary components: 1) in-home energy audits performed by trained and experienced Questar Gas Auditors, and 2) "do-it-yourself" mail-in audits with on-line data input availability. The in-home energy audit requires the customer to pay a nominal \$25 fee per service. This fee is added to the customer's gas bill. This fee is fully refundable by way of a credit on the customer's gas bill, upon participation in any ThermWise energy-efficiency rebate program. The do-it-yourself audit is offered at no charge. Customers participating in either home energy audit will receive a customized report recommending home improvements that can be implemented to reduce natural gas usage. In addition, the program will provide certain low-cost energy-efficiency measures at no charge for installation at the

customer's residence. Questar Gas will continue to offer this program to customers in the Company's Utah service territory and to administer the program. QGC DSM Exhibit 4.5 sets forth the complete program description for 2010.

11. **Low-Income Weatherization Assistance.** The Company is proposing to maintain funding for the Low-Income Weatherization Assistance Program at \$500,000 per year. Strong demand for furnace replacements from the program continues to drive a need for funding. The Company proposes to disburse \$250,000 every six months, with the disbursements occurring in January and in July. QGC DSM Exhibit 4.6 sets forth the complete program description for 2010.

12. **ThermWise Multifamily Rebates.** This program offers rebates for installing qualifying measures in multifamily projects. The Company is proposing to continue this program with the following improvements: 1) allow only one rebate to be paid per premise for attic and floor insulation rebate measures; 2) implement a tiered rebate structure for attic insulation rebates by adding a second rebate level of \$.07 per square foot rebate for installed insulation R-30 and above; 3) allow rebates only when the final R-value is at least R-38 but not more than R-60, in order to meet current energy building codes and align with DOE recommendations; and 4) add duct sealing and duct insulation rebate measures. These combined changes are intended to encourage higher levels of installed insulation to more closely align rebate costs to savings levels achieved. Implementing these changes will align the rebate measures with the other ThermWise programs (Appliance, Builder and Weatherization) and will by reduce customer and market confusion. This program targets both new and existing multifamily projects. The weatherization aspect of the program such as windows, insulation and duct work are only available for existing customers, not new construction. This program will continue to be available to Questar Gas Utah service territory

property owners/managers, home owner associations, and tenants. PECEI will continue to administer this program. QGC DSM Exhibit 4.7 sets forth the complete program description for 2010.

13. **ThermWise Business Custom Rebates.** The Company is proposing to continue this program for 2010. This program targets new and existing Utah GS commercial customers. This program augments the existing ThermWise Business Rebates program by offering rebates to business customers for energy savings resulting from more customized energy system improvements that are not otherwise available through a rebate from other ThermWise programs. The rebate would be in the form of a one-time cash payment to the customer upon successful completion and savings verification of the project. Nexant will continue to administer this program. QGC DSM Exhibit 4.8 sets forth the complete program description for 2010.

14. **Tariff Sheets.** Tariff sheets for all programs are attached in both legislative and proposed formats as QGC DSM Exhibit 4.9. The Company proposes that these tariff sheets become effective January 1, 2010.

### **III. MARKET TRANSFORMATION**

15. In addition to the DSM programs outlined above, Questar Gas is proposing to continue its comprehensive market transformation initiative. Market transformation involves ongoing and lasting changes to natural gas appliances and new construction markets, as well as natural gas conservation. Questar believes that its DSM programs, including its market transformation initiative, will continue to complement the State of Utah's goal of a 20% reduction in energy consumption by 2015.

16. The market transformation initiative has four distinct components. The first component is a market awareness campaign designed to continue the Company's involvement

in energy-efficiency and conservation promotion. The second component is a market awareness campaign designed to change consumer and market participant behaviors and to encourage persistent demand for energy-efficient products and practices.

17. The third component involves offering training related to building codes. The State Energy Program, a sub-division of the Utah Geological Survey, in partnership with and through partial funding from Questar Gas, conducted over sixty building codes training sessions since 2007. The purpose of the training was to support the adoption, awareness and enforcement of more stringent building codes associated with the current International Energy Conservation Code (IECC 2006), which became effective in Utah on January 1, 2007. Based on the success of previous training sessions, and the ongoing need in the market for additional and more specific training sessions, the Company is proposing to fund training sessions for 2010 at \$50,000. The training sessions will be scheduled beginning early-to mid-year 2010. The State Energy Program will continue to work with an outside vendor to design and conduct the training. QGC DSM Exhibit 4.10 sets forth a description of the proposed training.

18. The fourth component is the ThermWise.com website. The Company launched an informative, interactive, easy-to-use and dedicated energy-efficiency website ([www.ThermWise.com](http://www.ThermWise.com)) during 2007. The website provides consumers with DSM program descriptions and applications, information regarding the economics of energy efficiency, resources available to consumers to help them reduce their energy consumption, on-line energy audit input capability and links to other useful websites related to energy efficiency and conservation. The Company proposes to continue developing, enhancing and operating this website to increase customer awareness, education and participation in energy efficiency and conservation.

19. The Company proposes to continue to provide funding support to Salt Lake Community College (SLCC) in support of its Associate Degree program for Energy Management. The Company previously proposed to pay \$40,000 over three years (beginning in 2009) with a match by Rocky Mountain Power. The funding provided thus far has enabled SLCC to secure grant money to develop and implement the program. Questar Gas proposes continuing this funding by paying \$13,300 in 2010 to support the continued development and implementation of the program.

20. As part of its Market Transformation initiative, the Company will continue to pursue strategies to influence each market segment in the GS rate class to adopt higher levels of energy efficiency. Initial market transformation goals include: 1) achieving higher penetration of high-efficiency furnaces and water heaters in new and existing residential and commercial buildings; 2) recruiting trade allies to promote and deliver a complete line of energy-efficiency products; 3) encouraging trade allies to price the higher-efficiency products competitively with lower-efficiency products; 4) positioning energy-efficiency products as the market leaders; and 5) working with code enforcement officials to ensure energy-efficiency aspects of the building codes are understood and adopted by builders.

#### **IV. PROPOSED 2010 BUDGET**

21. The total 2010 budget for Questar Gas DSM programs and the Market Transformation Initiative is estimated at \$36.1 million and is shown in QGC DSM Exhibit 4.11. The primary driver for the budget increase for 2010 is a continued interest in the Thermwise weatherization program. As a result of the continued customer interest, Questar Gas anticipates paying approximately \$18.3 million more in rebates than projected in the 2009 budget. QGC DSM Exhibit 4.11 includes the 2009 budget for reference. The budget estimate is predicated on participation levels projected by each program administrator. Twelve month

actual customer participation, ending June 30, 2009 serves as a basis for projecting 2010 customer participation. To the extent actual participation levels differ from projected levels, actual costs will differ from budget. The Company will continue to report to the Division quarterly, and to provide the actual participation levels and related costs and gas savings compared to projections.

22. **ThermWise Home Energy Audit.** For 2010 this program will have very few operational changes from 2009. The systems and program created in the first three years of the program will continue to provide value to the DSM effort and produce natural gas savings for customers. The Company is projecting that the number of audits performed and the associated gas savings for this program will be slightly higher than those seen in 2009. It is expected that the overall costs for the program in 2010 will increase by 5%, as compared to 2009.

23. **ThermWise Weatherization Rebates.** This program far exceeded expectations and was well received by Questar Gas customers and marketplace contractors in 2009. The unexpectedly high levels of customer acceptance and participation in 2009 resulted in a mid-year reduction in rebate amounts to align with current market conditions and more accurately reflect the original design intent of the program. With the mid-2009 rebate changes and rebate measure improvements described above, the Company expects the program will continue to produce strong customer participation and even stronger benefit/cost scores. The Company projects a 343% increase in overall weatherization program costs for 2010 from the 2009 budget. Nearly all of the increase is directly attributable to a projected increase in the amount of rebates paid directly to customers. The projected natural gas savings for this program for 2010 are expected to increase by 539% from 2009 projections.

24. **ThermWise Builder Rebates.** For 2010 the Company is projecting an 11% reduction in program costs due mostly to a softening in the residential new single-family

construction market. Fewer homes will likely result in lower program participation and less gas savings. The Company projects a 17% decrease in natural gas savings under the program for 2010. While overall program costs, participation and natural gas savings are projected to be lower for 2010, the Company still intends to continue cost-effective program marketing and implementation as reflected in the program budget.

25. **ThermWise Appliance Rebates.** This program has been very well received by customers since program inception in 2007. The Company expects the 2010 program budget to increase by 3% and the related gas savings to increase by 5%. Increases resulting from increased customer participation and rebates paid are reflected in the budget. Rebates account for approximately 78% of the annual costs for this program.

26. **ThermWise Business Rebates.** The Company projects that the 2010 program budget will increase by 21% over the 2009 budget, and that natural gas savings will increase by 4%. As with other ThermWise programs, increased customer participation is driving budget increases. This program has the potential to result in the highest gas savings measures per rebate paid. Therefore, the Company expects to continue focus on targeted marketing to result in increased program participation and cost-effectiveness.

27. **ThermWise Multi-family Rebates.** This program was new in 2008, and experienced a slow evolution in terms of customer participation in 2008. However, for the first half of 2009, the program produced strong customer and contractor participation which translated into decatherm savings. Customer awareness and participation in this program continues to climb as a result of program marketing and outreach efforts and the Company expects continued program growth in 2010. The Company projects that the 2010 program budget will increase by 54% and the gas savings to increase by 143% over 2009 budgeted levels. Rebates account for approximately 61% of the annual costs for this program.

28. **ThermWise Business Custom Rebates.** This was also a new program for 2008, and as with the Multifamily Rebates program, this program has experienced a slow movement in terms of customer participation. In addition, due to the nature of this program there is often a substantial lag between the time of customer awareness, coordination, implementation, suggested project/program improvement and rebate funding. There continues to be solid customer awareness and interest in this program and many times this interest is transferred to the Business Rebates program as customers discover more simplified improvement options. The Company expects the 2010 program budget and gas savings to remain the same as the 2009 budgeted levels. Rebates account for approximately 26% of the annual costs for this program but, due to the nature of this program, Questar Gas will not incur many of the program administrative costs unless it finds natural gas savings and if a rebate is paid. Natural gas savings from customer participation in this program is usually substantial.

29. **Market Transformation.** The Company is proposing to build upon the success and momentum created in the previous three years with its ThermWise energy-efficiency education and awareness campaign. The 2010 proposed budget for Market Transformation includes \$800,000 in media purchases for year round and targeted advertising (same as 2009); \$95,000 for special marketing events, trade/consumer shows and special event sponsorships; \$75,000 for sports marketing and promotions with the three major universities in the state; and \$30,000 for national and regional industry association participation to leverage outside resources to advance energy efficiency in the state. The budget also includes \$30,000 for program design, \$13,300 for the SLCC Energy Management program, and \$50,000 for State of Utah codes training. The projected budget for Market Transformation shows an increase of 7% over 2009.

30. **Low-Income Weatherization.** The 2009 proposed budget for this program is \$500,000, which is the same as the 2009 budget of \$500,000. This funding level for Low-income Weatherization is a result of recommendations by the QGC DSM Advisory Group, including the Division of Public Utilities, Salt Lake Community Action Program, Utah Clean Energy and the State of Utah Department of Community and Economic Development and will be used for high-efficiency furnace replacements in low-income households.

31. The total 2009 budget is expected to increase by \$18.3 million. Total projected savings is expected to increase by 580,084 Dth/year. This increase in the 2010 proposed budget is consistent with the commitment that the Company made when it agreed to aggressively promote and implement cost-effective energy-efficiency programs. In short, the 2010 proposed budget reflects a concerted effort to reach all GS market segments and produce significant, persistent and cost effective natural gas savings through a comprehensive energy efficiency campaign.

## V. COST EFFECTIVENESS

32. A summary of the cost effectiveness for each program is attached as QGC DSM Exhibit 4.12. Page 1 of the exhibit summarizes the test results of the proposed programs along with the market transformation initiative. Although the market transformation initiative does not lend itself to the same economic analysis as the DSM rebate programs, it has been included so that the overall impact of all programs can be measured and analyzed. As shown on page 1, line 10, column C of QGC DSM Exhibit 4.12, the overall benefit-cost ratio for the Total Resource Cost (TRC) test of all programs and the market transformation activities is 2.2. And as shown on column G, the Utility Cost test (UCT) for all programs is 3.2. A benefit-cost ratio greater than 1 is indicative of benefits exceeding costs, and therefore “passes” the test. Additionally, as shown on line 10, column E, the overall benefit-cost ratio for the Participant

Cost test passes at 2.5, and as shown on column I, the Ratepayer Impact Measure test (RIM) for all programs passes at 2.1. A detailed benefit-cost analysis of each program by measure has been included in pages 2-11 of this exhibit.

33. The model developed by the Company to measure the cost effectiveness of the DSM Programs (DSM Model) is based on the California Standard Practice Manual and is the same model that was used in the 05-057-T01 docket. The DSM Model has been reviewed by Nexant and the DSM Advisory Group.

34. The DSM Model has the capability of running sensitivity analyses on various inputs and assumptions such as the discount rate and participation levels. The cost-effectiveness tests included in this application have been calculated using a 7% discount rate. This is the same discount rate that was used in the last year's DSM program application and this interest rate is consistent with the Company's IRP report filed in May 2009.

35. The Company has relied on specific market reports, industry studies, the DSM Advisory Group, and the expertise of PECEI and Nexant to arrive at the savings levels, measure life and incremental customer cost for each measure of each program. QGC DSM Exhibit 4.13 provides the source and/or references for the estimated gas savings (pages 1-5), measure life (pages 6-9), and incremental cost (pages 10-14) for each measure of each program.

## **VI. PROGRAM EVALUATION**

36. During the summer of 2007, the Company worked with the Division to develop a comprehensive and cost-effective DSM Evaluation Plan for natural gas DSM programs. The Commission gave approval to the DPU Evaluation Plan November 20, 2007. The Company began work on the Commission approved evaluation plan shortly after the order related to docket 07-57-05 was issued.

37. The Company published a request for proposal (RFP) from third-party evaluation firms on February 1, 2008. The Company sent the RFP to over forty evaluation firms and posted it on an industry website in an effort to obtain strong evaluation plans and competitive bids. As the Company conducted analysis of proposals, it also sought the support and advice of the DSM Advisory Group. Ultimately, the Company selected the proposal from the team of Cadmus (formerly Quantec) and TechMarket Works. The Company announced the winning proposal on April 11, 2008.

38. Cadmus/TechMarket Works (Cadmus) began work on the evaluation plan after contracts were finalized in early June 2008. The plan requires Cadmus to submit an evaluation in two phases with a deliverable report due to the Company at the end of each phase. Phase I of the evaluation looked at program processes and included but was not limited to the following: energy-efficiency programs and measures offered, accounting procedures, rebate funding process, general work flow, rebate process time-frame and safeguards such as fraud prevention and auditing procedures, scheduling and customer interface, and research and evaluation.

39. The Phase I Evaluation Report was completed and submitted by Cadmus to the Division of Public Utilities and the Company on October 31, 2008. In addition, Cadmus presented the summary findings of the Phase 1 report to the DSM Advisory Group on 11-20-08 and the full report was filed with the PSC 11-30-08.

40. Phase II of the evaluation will focus on the impact, process and market transformation attributable to the Company's DSM programs and measures. The overriding goal of the Phase II evaluation is to verify program cost effectiveness through impact analysis, natural gas savings verification, customer participation and overall program performance. Cadmus began data collection for the Phase II report and will continue to do so through the end

of March 2010. The Phase II report is scheduled to be delivered to the Company and Division of Public Utilities by June 30, 2010.

## **VII. HOUSE JOINT RESOLUTION 9**

41. During the preparation of this Filing, the Company was asked by the commission staff to comment on House Joint Resolution 9 which was passed during the 2009 Utah legislative session. (A full copy of the resolution is attached as Exhibit 4.14) This resolution promotes cost-effective energy efficiency and utility demand side management. During the drafting of the resolution the Company was approached by the drafters and asked to give input concerning what would be a reasonable annual gas-savings goal. Recognizing and anticipating that the Company's Conservation Enabling Tariff may become permanent, enabling the company to continue its commitment to DSM programs, the Company agrees that a .5% of annual retail sales savings goal is reasonable. The Company recommended that Dths saved should be measured and reported using deemed savings identified in the DSM Cost Effectiveness model approved by the Public Service Commission and reported quarterly to the Division and Public Service Commission. The Company believes that this current Application for Approval of the Fourth Year DSM Budget, continuing the efforts of the previous three years, accomplishes the intent of the resolution.

## **VIII. PRAYER FOR RELIEF**

42. Questar Gas has successfully implemented a broad range of DSM programs and a Market Transformation Initiative. The Company has implemented best practices to help ensure that necessary and reasonable steps have been taken to implement cost-effective programs that benefit all GS customers. This 2010 DSM application and budget will continue and expand these efforts to meet the gas savings goals of customers and the State of Utah.

43. Therefore, Questar Gas respectfully requests that the Commission issue an order: 1) approving the application for the 2010 budget for the DSM portion of the CET/DSM Pilot Programs and continuation of Questar Gas' market transformation initiative; and 2) approving the proposed tariff sheets effecting certain improvements in the DSM Component of the CET/DSM Pilot Program.

DATED this 1st day of October, 2009.

Respectfully submitted,

QUESTAR GAS COMPANY

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Colleen Larkin Bell (5253)  
Jenniffer Nelson (7947)  
Attorneys for Questar Gas Company  
180 East First South  
P.O. Box 45360  
Salt Lake City, Utah 84145-0360  
(801) 324-5556

**CERTIFICATE OF SERVICE**

I, Evelyn Zimmerman, certify that a true and correct copy of the foregoing

Application was served upon the following by electronic mail on October 1, 2009:

<p>Michael Ginsberg                  Patricia E. Schmid                  Assistant Attorney Generals                  500 Heber M. Wells Building                  160 East 300 South                  Salt Lake City, UT 84111                  mginsberg@utah.gov                  pschmid@utah.gov</p>	<p>Sarah Wright                  Executive Director                  Utah Clean Energy                  917 2<sup>nd</sup> Avenue                  Salt Lake City, UT 84103                  sarah@utahcleanenergy.org</p>
<p>Paul H. Proctor                  Assistant Attorney General                  500 Heber M. Wells Building                  160 East 300 South                  Salt Lake City, UT 84111                  pproctor@utah.gov</p>	<p>Reed T. Warnick                  Acting Executive Director                  Committee of Consumer Services                  400 Heber M. Wells Building                  160 East 300 South                  Salt Lake City, UT 84111                  rwarnick@utah.gov</p>
<p>Gary A. Dodge                  Hatch, James &amp; Dodge                  10 West Broadway, Suite 400                  Salt Lake City, UT 84101                  gdodge@hjdllaw.com</p>	<p>Kevin Higgins                  Neal Townsend                  Energy Strategies                  39 Market Street, Suite 200                  Salt Lake City, UT 84101                  khiggins@energystrat.com                  ntownsend@energystrat.com</p>
<p>F. Robert Reeder                  William J. Evans                  Parsons Behle &amp; Latimer                  201 South Main Street, Suite 1800                  P.O. Box 45898                  Salt Lake City, UT 84145-0898                  bobreeder@parsonsbehle.com                  wevans@parsonsbehle.com</p>	<p>Roger Swenson                  Energy Consultant                  US Magnesium LLC                  238 North 2200 West                  Salt Lake City, Utah 84116                  roger.swenson@prodigy.net</p>
<p>Betsy Wolf                  Utility Ratepayer Advocate                  Salt Lake Community Action Program                  764 South 200 West                  Salt Lake City, UT 84101                  bwolf@slcap.org</p>	<p>Roger J. Ball                  1375 Vintry Lane                  Salt Lake City, UT 84121                  ball.roger@gmail.com</p>